



**FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: Mary Knight
DOCKET NO.: 23-04131.001-R-1
PARCEL NO.: 05-2-23-17-04-401-008

The parties of record before the Property Tax Appeal Board are Mary Knight, the appellant; and the Madison County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **No Change** in the assessment of the property as established by the **Madison** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$20,310
IMPR.: \$61,150
TOTAL: \$81,460

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Madison County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2023 tax year after notice of application of a township equalization factor. The Property Tax Appeal Board finds that it has limited jurisdiction over the parties and the subject matter of the appeal.

Findings of Fact

The subject property consists of a 1-story dwelling of vinyl siding frame exterior construction with 1,609 square feet of living area.¹ The dwelling was constructed in 2015 and is approximately 8 years old. Features of the home include an unfinished basement, central air conditioning, a woodstove and a 544 square foot 2-car garage. The property has an approximately 88,180 square foot site² and is located in St. Jacob, St. Jacob Township, Madison County.

¹ The Board finds the subject dwelling size to be 1,609 square feet of living area as found in the appraisal which contains a sketch of the subject with measurements. The Board further finds the subject property was built in 2015 as depicted in the subject's property record card submitted by the board of review.

² The parties disagree as to the subject's site size. The appraisal reports a 94,090 square foot size while the board of review reports the subject has an 88,180 square foot site. Neither party submitted documentation to support the site size reported. The Board finds the best description of the subject's site was found in the grid analysis submitted by the board of review.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$200,600 as of May 4, 2021. The appraisal was prepared by Colette M. McKenna, a Certified Residential Real Estate Appraiser. The report was developed to determine the fair market value of the subject property as of the report's effective date.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value selecting five comparable sales located from 0.30 of a mile to 4.06 miles from the subject property. The comparables have sites ranging in size from 10,019 to 218,671 square feet of land area and are improved with 1-story dwellings of average, average-, or average+ quality construction that range in size from 1,360 to 1,784 square feet of living area. The homes range in age from 21 to 59 years old. Each comparable has a basement with one having finished area. Each dwelling has central air conditioning and two homes each have a fireplace. Four comparables each have a 2-car garage and one comparable has a 2-car carport. The comparables sold from September 2020 to April 2021 for prices ranging from \$175,000 to \$204,500 or from \$109.30 to \$150.37 per square foot of living area, land included.

The appraiser adjusted the comparables for differences with the subject in site size, quality of construction, age, dwelling size, finished basement area, condition and garage amenity arriving at adjusted sales prices of the comparables ranging from \$179,950 to \$218,650 and an opinion of market value for the subject property under the sales comparison approach of \$200,600. Based on this evidence, the appellant requested the subject's assessment be reduced to \$75,110 which equates to a market value of \$225,353 or \$140.06 per square foot of living area,³ land included when applying the statutory assessment level of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$81,460. The subject's assessment reflects a market value of \$244,404 or \$151.90 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.⁴

In response, the board of review submitted written comments contending its comparable sales are closer to the subject in age and location than the appraisal comparables.

In support of its contention of the correct assessment the board of review submitted information on four comparables located from 0.07 of a mile to one mile from the subject property. The comparables have sites that range in size from 8,940 to 89,510 square feet of land area and are improved with 1-story dwellings of frame exterior construction ranging in size from 1,346 to 1,684 square feet of living area. The homes range in age from 7 to 11 years old. Each comparable has a basement, with two having finished area. Each dwelling has central air

³ When using a 1,609 square foot dwelling size.

⁴ Procedural rule Sec. 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2023.

conditioning⁵ and a garage ranging in size from 483 to 782 square feet of building area. Three homes each have one fireplace. The comparables sold from July 2021 to June 2023 for prices ranging from \$289,500 to \$435,000 or from \$210.09 to \$258.31 per square foot of living area, land included.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales, or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The appellant submitted an appraisal and the board of review submitted four comparable sales for the Board's consideration. The Board finds each of the appraisal comparables sold from 21 to 28 months prior to the lien date at issue and are dissimilar to the subject in age, being from 14 to 52 years older than the subject property. Furthermore, the appraiser makes different adjustments to comparables #3 and #4 which are identical in age and nearly identical in dwelling size, without explanation while comparables #1 and #5 which have identical site sizes have different adjustments relative to the subject's site size. As a result, less weight is given to the opinion of value for the subject as presented in the appraisal. The Board also gives less weight to board of review comparables #2 and #3 which sold in 2021, less proximate in time to the assessment date at issued in this appeal.

The Board finds the best evidence of market value to be board of review comparables #1 and #4 which sold proximate in time to the January 1, 2023 assessment date and are more similar to the subject in location, age, design and dwelling size. However, these properties present varying degrees of similarity to the subject in site size, basement amenities and garage capacity, suggesting adjustments are needed to make these two properties more equivalent to the subject. These two comparables sold in July 2022 and June 2023 for prices of \$338,000 and \$435,000 or for \$233.43 and \$258.31 per square foot of living area, including land. The subject's assessment reflects a market value of \$244,404 or \$151.90 per square foot of living area, including land, which falls well below the two best comparable sales in the record. After considering adjustments to the comparables for differences with the subject, the Board finds a reduction in the subject's assessment is not justified.

⁵ The board of review submitted property record cards for each of its comparable properties which disclosed all of the dwellings have central air conditioning.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Member



Member



Member

DISSENTING: _____

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: _____

October 15, 2024



Clerk of the Property Tax Appeal Board

IMPORTANT NOTICE

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

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